

Quattlebaum, Grooms, Tull & Burrow PLLC

A PROFESSIONAL LIMITED LIABILITY COMPANY

111 Center Street

Suite 1900

Little Rock, Arkansas 72201

Chad W. Pekron
cpekron@qgtb.com

(501) 379-1700
Writer's Direct Facsimile
(501) 379-3826
Writer's Direct Dial
(501) 379-1726

March 3, 2014

By Electronic Mail

Mr. Lance Nixon (nixon.lance@epa.gov)
Mr. Marvin Benton (benton.marvin@epa.gov)
United States Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

Re: Cedar Chemical Corporation Superfund Site, West Helena, Phillips County, Arkansas

Gentlemen:

We write on behalf of ExxonMobil Chemical Company ("ExxonMobil") in response to the Special Notice Letter from Carl Edlund, P.E., dated December 31, 2013 (which was received by ExxonMobil on January 15, 2014), regarding the Cedar Chemical Corporation Superfund Site (the "Site"). The Special Notice Letter requested that ExxonMobil inform you, within 14 days, whether ExxonMobil "plan[s] to enter into on-going, good-faith negotiations to enter into a settlement agreement with the EPA to perform a Remedial Investigation and Feasibility Study at the Site."

As we have previously discussed with you, ExxonMobil intends to continue to address issues regarding the Site in the spirit of cooperation. ExxonMobil also wishes to commend the EPA for its efforts in identifying other Potentially Responsible Parties with respect to the Site. Without admitting any liability for any costs with respect to the Site and without waiving any defenses to such liability, ExxonMobil is willing to enter into good-faith negotiations with respect to the Site. As you are aware, ExxonMobil has worked with the Arkansas Department of Environmental Quality with respect to the Site, pursuant to a voluntary Corrective Action Order, at a cost of well over \$1 million. Because those prior efforts will provide a critical foundation for any Remedial Investigation and Feasibility Study with respect to the Site; ExxonMobil asks that the EPA take those efforts into account in any future negotiations.

Please do not hesitate to contact me if you have any questions. We look forward to working with you in the future.

Mr. Lance Nixon
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Page 2

Cordially,

QUATTLEBAUM, GROOMS,
TULL & BURROW PLLC

A handwritten signature in black ink, appearing to read "Chad W. Pekron". The signature is fluid and cursive, with the first name "Chad" being more prominent.

Chad W. Pekron

Enclosure

cc (via electronic mail):

Kevin Vaughan
D. Allan Gates
Ann P. Faitz
Kim K. Burke
Stuart Rixman
Kathleen B. Campbell
Skip Kazmarek
Eve Barron
Brian S. Montag
Mary Theresa S. Kenny
Andrew Stilton
Chintan Amin
Edward Lewis